

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF PUERTO RICO**

In re:

The Financial Oversight and Management Board for  
Puerto Rico,

as representative of

The Commonwealth of Puerto Rico, *et al.*,

Debtors.<sup>1</sup>

PROMESA

Title III

No. 17 BK 3283-LTS

In re:

The Financial Oversight and Management Board for  
Puerto Rico,

as representative of

The Puerto Rico Electric Power Authority,

Debtor.

PROMESA

Title III

No. 17 BK 04780-LTS

**Court Filing Relates Only to  
PREPA and Shall Only be Filed  
in Case No. 17 BK 4780-LTS and  
Main Docket 17 BK 3283-LTS**

**AD HOC GROUP OF PREPA BONDHOLDERS' INFORMATIVE MOTION AND  
NOTICE OF REQUEST TO BE HEARD AT NOVEMBER 13, 2017 HEARING**

The Ad Hoc Group of PREPA Bondholders (collectively, the “**Ad Hoc Group**”) hereby files this request to be heard pursuant to the Court’s Order dated November 1, 2017 [Dkt. No. 369] (the “**Order**”) setting forth guidelines for parties wishing to be heard at the hearing on November 13, 2017 at 1:30 p.m. (Atlantic Standard Time) (the “**Hearing**”).

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<sup>1</sup> The Debtors in these Title III Cases, along with each Debtor’s respective Title III case number and the last four (4) digits of each Debtor’s federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation (“COFINA”) (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority (“HTA”) (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS”) (Bankruptcy Case No. 17 BK 3566-LTS) (Last Four Digits of Federal Tax ID: 9686); and (v) Puerto Rico Electric Power Authority (“PREPA”) (Bankruptcy Case No. 17 BK 4780-LTS) (Last Four Digits of Federal Tax ID: 3747) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

### **BACKGROUND AND PROCEDURAL HISTORY**

1. Pursuant to the Order, the Court will conduct a Hearing on November 13, 2017 on the *Urgent Motion of Official Committee of Unsecured Creditors for Order, Under 11 U.S.C. § 1103 and Bankruptcy Rule 2004, Authorizing Discovery With Respect to PREPA Engagement of Whitefish Energy Holdings, LLC and Urgent Request for Hearing* [Dkt. No. 364].

2. The Order requests that Counsel to parties who wish to speak at the Hearing file an “Informative Motion,” stating their name and identifying the party for which they intend to appear, estimating the number of additional persons who wish to attend the hearing, and the location (New York or San Juan) at which they intend to appear.

3. The Ad Hoc Group filed the *Joinder of the Ad Hoc Group of PREPA Bondholders to the Urgent Motion of Official Committee of Unsecured Creditors for Order, Under 11 U.S.C. § 1103 and Bankruptcy Rule 2004, Authorizing Discovery With Respect to PREPA Engagement of Whitefish Energy Holdings, LLC and Urgent Request for Hearing* (the “**Joinder**”) [Dkt. No. 397] dated November 6, 2017.

### **REQUEST TO BE HEARD**

4. Gregory A. Horowitz will appear on behalf of the Ad Hoc Group at the Hearing in Courtroom 17C in the United States District Court for the Southern District of New York. In addition to Gregory A. Horowitz, two other persons representing the Ad Hoc Group wish to attend the hearing in New York.

5. Gregory A. Horowitz may respond, as appropriate, to any statements made by any parties in connection with the relief requested in the Joinder, or with the Title III Proceedings or any adversary proceeding pending in the Title III Proceedings.

WHEREFORE, the Ad Hoc Group respectfully requests to be heard on this matter in Courtroom 17C in the United States District Court for the Southern District of New York at the Hearing on November 13, 2017.

We hereby certify that, on this same date, we electronically filed the foregoing with the clerk of the Court using the CM/ECF system, which will notify the attorneys of record.

**RESPECTFULLY SUBMITTED,**

In San Juan, Puerto Rico, today November 7, 2017.

**TORO, COLÓN, MULLET, RIVERA  
& SIFRE, P.S.C.**

s/ Manuel Fernández-Bared  
MANUEL FERNÁNDEZ-BARED  
USDC-PR No. 204,204  
E-mail: mfb@tcmrslaw.com

s/ Linette Figueroa-Torres  
LINETTE FIGUEROA-TORRES  
USDC-PR No. 227,104  
E-mail: lft@tcmrslaw.com

s/ Nayda Perez-Roman  
NAYDA PEREZ-ROMAN  
USDC-PR No. 300,208  
E-mail: nperez@tcmrslaw.com

P.O. Box 195383  
San Juan, PR 00919-5383  
Tel.: (787) 751-8999  
Fax: (787) 763-7760

*Counsel to the Ad Hoc Group of PREPA  
Bondholders*

**KRAMER LEVIN NAFTALIS &  
FRANKEL LLP**

s/ Gregory A. Horowitz  
AMY CATON\*  
THOMAS MOERS MAYER\*  
GREGORY A. HOROWITZ\*  
ALICE J. BYOWITZ\*  
DOUGLAS BUCKLEY\*\*  
1177 Avenue of the Americas  
New York, New York 10036  
Tel.: (212) 715-9100  
Fax: (212) 715-8000  
Email: tmayer@kramerlevin.com  
acaton@kramerlevin.com  
ghorowitz@kramerlevin.com  
abyowitz@kramerlevin.com  
dbuckley@kramerlevin.com

\*admitted *pro hac vice*

\*\*admitted *pro hac vice* in Case No. 17-BK-3283-LTS

*Counsel to the Ad Hoc Group of PREPA  
Bondholders*